<u>Application No. 09/619,876</u> DOCKET: 1232-4636

**PATENT** 

## **REMARKS**

## Claim Status

The Office Action indicates that claims 1-2, 5, 7-11, and 15-18 are pending. Claims 1, 2, 15, 17 and 18 are herein amended for additional clarity. No new matter has been added.

## Claim Objections

Examiner objects to Claims 1-2, 5, 7-11 because of the misspelling of "paning" in independent claim 1. Applicant has corrected the spelling to "panning", and thus submits that the objection to Claims 1-2, 5, 7-11 has been obviated and should be withdrawn.

## Claim Rejections

Claims 1, 2, 5, 7-11 and 15-18 have been rejected under 35 U.S.C. §102(e) as being anticipated by Paff (U.S. Patent No. 6,665,004). Applicants respectfully traverse this rejection, disagree with the Examiner's reading of the claims and the prior art, and respectfully submit that the claims (i.e., independent claims 1, 17, and 18) as properly understood by those skilled in the art are not anticipated by Paff for at least the following reasons.

Although Applicants have amended claims 1, 17, and 18 for additional clarity, Applicants respectfully submit that the claims as pending prior to the instant amendment are clearly not anticipated by Paff. More specifically, for example, in the Office Action dated April 8, 2005, the Examiner alleges that "first symbol" in the claimed subject matter corresponds to a symbol indicating the relative location of the device or control of the device on the map 30 in Paff, and "second symbol" in the claimed subject matter corresponds to the number of the dome camera displayed on the numeric display 72 in Paff. (See 4/8/05 Office Action, p. 3). That is, "first

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symbol" and "second symbol" are considered by the Examiner as the symbols for camera selection.

However, according to Applicants' claimed subject matter, "first symbol" and "second symbol" are not used for camera selection. Rather, as set forth by the plain language of Applicants' claimed subject matter, "camera symbol" is used for camera selection, and also indicates the setting location of the imaging apparatus on the map, while "first symbol" and "second symbol" are the symbols for selection of the preset parameter. More specifically, the "first symbol" of the claimed subject matter is the symbol corresponding to the preset parameter information to control at least one operation of panning, tilting, zooming and irising of the imaging apparatus. That is, the "first symbol" is quite different from the "camera symbol". Moreover, the "second symbol" of the claimed subject matter is, as well as "first symbol", the symbol corresponding to the preset parameter information to control as least one operation of panning, tilting, zooming and irising of the imaging apparatus. The numeric display 71 for camera selection in Paff, on the other hand, is quite different from the "second symbol".

Applicants' illustrative embodiments are also consistent with the plain language meaning of these claim limitations. For instance, in accordance with an illustrative embodiment, those skilled in the art understand that "first symbol" may correspond to the preset symbols 531-1 and 521-2 in Figure 4, while "second symbol" may correspond to the preset buttons 641 and 642 in Figure 5. In accordance with such illustrative embodiments, Applicants also note that those skilled in the art understand that the recitation "different area from the map" may correspond to the video camera control panel 640 in Figure 5. Applicants refer to the illustrative embodiments, not to any way limit the claim scope to the disclosed embodiments, but simply to note that the specification is consistent with the ordinary, plain language meaning of the claim language as

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understood by those skilled in the art, and thus to further highlight the distinction between the properly understood claim limitations and Paff.

Applicants respectfully submit, therefore, that for at least the foregoing reasons it cannot be said that Paff anticipates Applicants' claimed invention even as recited in the claims prior to the instant invention.

As noted above, however, Applicants have amended claims 1, 17, and 18 for additional clarity. Support for these amendments is found throughout the specification and drawings. For instance, support for "first synthetic map image" can be found throughout the specification, and, for example, in an embodiment corresponds to map 502 (Fig. 3) to which the camera to be controlled is not selected. Additionally, in accordance with such an embodiment, support for "second synthetic map image" may be provided by the map 502 (Fig. 4) to which the camera to be controlled is selected.

As recited in amended claim 1, after selecting the imaging apparatus to be controlled in accordance with designating the camera symbol corresponding to the imaging apparatus on the first synthetic map image obtained by synthesizing the camera on the map image, the user is able to select the first symbol on the map and the second symbol on a different area from the map. In Paff, on the contrary, after selecting the imaging apparatus to be controlled in accordance with designating the camera symbol on the map or inputting the numeric number on the numeric display, the parameter of the camera is automatically determined and output without the user's selection of the preset parameter. Thus, this distinction is yet an additional and independent reason that Paff cannot be said to anticipate Applicants' claimed invention.

Accordingly, for at least the foregoing reasons, the independent claims, and the claims depending therefrom, are believed to be patentably distinct over Paff, and thus Applicants

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respectfully request that the §102(e) rejection be withdrawn.

Dependent Claims

Applicant has not independently addressed the patentability of the dependent claims because Applicant submits that, as the independent claims from which the dependent claims depend are believed allowable for at least the reasons discussed *supra*, the dependent claims are believed allowable for at least similar reasons. Applicant, however, reserves the right to address and present independent bases for allowance of the dependent claims should such be necessary and appropriate.

**CONCLUSION** 

In view of the foregoing, Applicant submits that the claims as herein presented are allowable over the prior art of record and that the rejections, being overcome or otherwise rendered moot, be withdrawn. Applicant further submits that the application is hereby placed in condition for allowance which action is respectfully requested.

If any issues remain, or if the Examiner has any suggestions for expediting allowance of this application, the Examiner is respectfully requested to contact the undersigned at the telephone number listed below.

**AUTHORIZATION** 

Applicants believe no fee or extension of time is required for filing this paper.

However, should an extension of time be necessary to render this filing timely, such extension is hereby petitioned, and the Commissioner is hereby authorized to charge any additional fees that

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may be required for this paper, or credit any overpayment, to Deposit Account No. 13-4500,

Order No. 1232-4636.

Respectfully submitted,

MORGAN & FINNEGAN, L.L.P.

DANID V. ROSSI Res. No. 36,65

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FOL: Steph

By:

Stephen J. Manetta

Registration No. 40,426

Correspondence Address:

MORGAN & FINNEGAN, L.L.P. 3 World Financial Center New York, NY 10281-2101 (212) 415-8700 Telephone (212) 415-8701 Facsimile